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Attorneys for Caffe Ettore Incorporated,

a California corporation

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION

In Re:

Caffe Ettore Incorporated, a California corporation

1168 National Drive, Suite 10, Sacramento, CA 95834

TIN: xx-xxx1447

Debtor(s).

Case No.: 18-22152-B-11

DC No.: DL-02

Date: April 17, 2018 Time: 2:00 PM

Judge: Jaime
Courtroom: 32; Dept B

Place: 501 I Street, 6th Floor

Sacramento CA 95814

DECLARATION OF ETTORE RAVAZZOLO IN SUPPORT OF
MOTION TO AUTHORIZE HONORING OF
PRE-PETITION GIFT CARDS, GIFT CERTIFICATES AND CUSTOMER DEPOSITS

I, Ettore Ravazzolo, declare as follows:

- 1. I am the President & Chief Executive Officer of Caffe Ettore Incorporated, a California corporation ("Debtor").
- 2. I have personal knowledge of the matters set forth in this declaration, except as to those matters set forth on information and belief, which I believe to be true. If called upon, I am competent to testify as to the matters set forth in this declaration, and would testify in accordance with this

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declaration.

- 3. Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code [11 U.S.C. §101, et seq.] on April 10, 2018. No trustee has been appointed in Debtor's Chapter 11 case, and Debtor is managing its affairs as debtor-in-possession.
- 4. Debtor owns and operates Ettore's Bakery & Café locations in Roseville and Sacramento, California, and a production facility in Sacramento, California. Debtor's businesses provide dining services, catering, sale of pastries, custom desserts and wedding cakes at retail. Debtor also supplies baked goods at wholesale to Nugget supermarket locations in Marin, Sonoma and Sacramento Counties, as well as to other trade customers.
- 5. During the ordinary course of business, Debtor offered for purchase gift cards and gift certificates to be applied to future purchases of goods and services offered by Debtor. As of the date of the bankruptcy filing, the outstanding gift cards and gift certificates not yet redeemed total approximately \$175,085.
- 6. As a specialized European bakery, Debtor accepted from customers deposits to be applied towards the purchase of custom baked goods the Debtor was to create and provide to the customer, such as wedding cakes and other custom requests for baked goods. As of the date of the bankruptcy filing, customer deposits for custom baked goods total approximately \$83,600.
- 7. Debtor seeks an order authorizing the honoring of outstanding gift cards and gift certificates sold by Debtor pre-petition and the honoring of all pre-petition deposits submitted to Debtor to be applied towards the purchase of custom baked goods provided by the Debtor.
- 8. I know that our failure to honor the financial commitments made in good faith by patrons of Debtor would cause a significant loss of goodwill between Debtor and its customers and potentially cause irreparable harm to Debtor through the loss of its customer base and future sales.
- 9. I believe that each of the outstanding gift cards and gift certificates are in amounts less than \$2,850.

10. I believe that the majority of the deposits for custom baked goods are in amounts less than \$2,850. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at SACANNENTO, California. Dated: 4-12-18 Ettore Ravazzolo \\Datai-qbs\wdgx\\DATA\CLIENTS\C19390\\g00030061_WPD